

BSF


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June 7, 2024

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**APPLICATION GRANTED
SO ORDERED**

6/10/24 
John G. Koeltl, U.S.D.J.

Re: **Jane Doe v. Russell Wendell Simmons, 1:24-cv-01043-JGK**

Your Honor:

On behalf of Plaintiff Jane Doe, we write pursuant to ¶ VI(A)(2) of Your Honor's Individual Practices and Rules to request permission to publicly file redacted versions of the Declarations of Kenya Davis and Jane Doe (the "Declarations"), and all attached exhibits, which are referenced in Doe's forthcoming opposition to Defendant's Motion for Judgment on the Pleadings (Dkt. 32). The redacted Declarations and attached exhibits will be submitted in support of Doe's opposition memorandum. In accordance with ¶ VI(A)(2), copies of the Declarations and attached exhibits have been contemporaneously filed under seal with this letter-motion.

We are seeking approval to file redacted versions of the Declarations and attached exhibits because this Court granted Doe permission to proceed anonymously (Dkt. 9), and these documents identify Doe by name. *See also* Dkt. 25 (granting Defendant's seal motion concerning Doe's identity). Thus, to protect Doe's anonymity, we respectfully request that Your Honor grant us permission to publicly file redacted versions of the Declarations and attached exhibits, and the unredacted versions under seal.

We have conferred with Defendant's counsel on this issue, and they are unopposed.

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Kenya K. Davis

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cc: Counsel of Record (via ECF)
